

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

**IN RE: CENTURYLINK SALES
PRACTICES AND SECURITIES
LITIGATION**

MDL No. 17-2795 (MJD/KMM)

This Document Relates to:

Civil Action No. 18-296 (MJD/KMM)

**DECLARATION OF MICHAEL D. BLATCHLEY
IN SUPPORT OF PLAINTIFF'S MEMORANDUM OF LAW IN OPPOSITION
TO DEFENDANTS' MOTION TO DISMISS**

I, Michael D. Blatchley, hereby declare as follows:

1. I am a partner of the law firm Bernstein Litowitz Berger & Grossmann LLP (“BLB&G”) and represent Lead Plaintiff State of Oregon by and through the Oregon State Treasurer and the Oregon Public Employee Retirement Board, on behalf of the Oregon Public Employee Retirement Fund (“Oregon”), and named plaintiff Fernando Alberto Vildosola, as trustee for the AUFV Trust U/A/D 02/19/2009 in the above-captioned action. I submit this declaration in support of Plaintiff’s Memorandum of Law in Opposition to Defendants’ Motion to Dismiss. Attached as Exhibits A through E are true and correct copies of the following:

EXHIBIT A: The Consolidated Class Action Complaint For Violations Of The Federal Securities Law, filed March 3, 2017 in *Hefler v. Wells Fargo & Company*, No. 3:16-cv-05479-JST (N.D. Cal.)

EXHIBIT B: The State of Minnesota’s September 25, 2018 Notice Of Motion For Sanctions, Motion To Compel Discovery, Motion To Amend The State’s Complaint, And Motion To Amend The Scheduling Order in *State of Minnesota v. CenturyTel Broadband Services LLC d/b/a CenturyLink Broadband*, No. 02-CV-17-3488 (Anoka County)

EXHIBIT C: CenturyLink Code of Conduct (November 13, 2013 Revision)

EXHIBIT D: Summary of Scienter-Related Complaint Allegations

EXHIBIT E: CenturyLink Response Letters to the SEC dated August 24, 2015, and September 22, 2015

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 12th day of October, 2018 in New York, New York.

Michael D. Blatchley

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